

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

STANADYNE LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10207 (TMH)

(Jointly Administered)

**DECLARATION OF ANDRES A. ESTRADA WITH RESPECT TO THE TABULATION
OF VOTES ON THE COMBINED DISCLOSURE STATEMENT AND PLAN
OF LIQUIDATION DATE SEPTEMBER 25, 2023**

I, Andres A. Estrada, depose and say under the penalty of perjury:

1. I am a Managing Director of Corporate Restructuring Services employed by Kurtzman Carson Consultants LLC (“KCC”), whose main business address is 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, California 90245.

2. I submit this declaration (the “Declaration”) with respect to the solicitation of votes and the tabulation of Ballots cast on the *Combined Disclosure Statement and Plan of Liquidation Dated September 25, 2023* (Docket No. 604) (the “Plan”).² Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am authorized to submit this Declaration on behalf of KCC. If I were called to testify, I could and would testify competently as to the facts set forth herein.

1. The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors’ headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

² Terms not otherwise defined herein shall have the same meanings ascribed to them in the Solicitation Procedures Order

3. The Bankruptcy Court authorized KCC's retention (i) as claims and noticing agent to the Debtors on February 22, 2023 pursuant to the *Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Claims and Noticing Agent Effective as of the Petition Date* (Docket No. 54), and (ii) as administrative advisor to the Debtors on March 29, 2023 pursuant to the *Order Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants LLC as Administrative Advisor Effective as of the Petition Date* (Docket No. 139) (together, the "Retention Orders"). The Retention Orders authorize KCC to assist the Debtors with, among other things, the service of solicitation materials and tabulation of votes cast to accept or reject the Plan. KCC and its employees have considerable experience in soliciting and tabulating votes to accept or reject chapter 11 plans.

SERVICE AND TRANSMITTAL OF SOLICIATION PAKCAGES AND THE TABULATION PROCESS

4. On September 26, 2023, the Bankruptcy Court entered the *Order Granting Motion of the Official Committee of Unsecured Creditors for an Order (I) Approving on an Interim Basis the Adequacy of Disclosures in the Combined Disclosure Statement and Plan of Liquidation, (II) Scheduling the Confirmation Hearing and Deadline for Filing Objections, (III) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Combined Plan and Disclosure Statement, and Approving the Form of Ballot and Solicitation Package, and (IV) Approving the Notice Provisions* (Docket No. 614) (the "Solicitation Procedures Order"), establishing procedures to solicit votes from and tabulate Ballots submitted by holders of claims entitled to vote on the Plan. KCC adhered to the procedures outlined in the Solicitation Procedures Order and I supervised the solicitation and tabulation performed by KCC's employees.

5. Pursuant to the Solicitation Procedures Order, KCC transmitted Solicitation Materials to those holders of claims entitled to vote on the Plan as of the September 25, 2023 Voting Record

Date. Only holders of Claims in Class 3 (Cerberus Deficiency Claim), Class 4 (General Unsecured Claims), and Class 5 (Convenience Claims) (together, the “Voting Classes”) were entitled to vote to accept or reject the Plan. In lieu of Solicitation Materials, all known (i) holders of claims in Classes 1 (Priority Non-Tax Claims) and 2 (Secured Claims) received the Unimpaired Non-Voting Status Notice and (ii) holders of Class 6 (Equity Interests) received the Impaired Non-Voting Status Notice (collectively, the “Non-Voting Classes”). Furthermore, KCC caused the Confirmation Hearing Notice and Solicitation Procedures Order to be served on the creditor matrix and all other parties required to receive such notice, all in accordance with the Solicitation Procedures Order.

6. KCC worked closely with Counsel to the Official Committee of Unsecured Creditors to identify the holders in the Voting Classes entitled to vote on the Plan and to coordinate the distribution of Solicitation Materials to such holders. A detailed description of KCC’s distribution of Solicitation Materials to holders entitled to vote on the Plan is set forth in the Certificate of Service, which was filed with the Bankruptcy Court of October 18, 2023 (D.I. 645).

7. On September 26, 2023, KCC posted links to the electronic versions of the Confirmation Hearing Notice, the Plan, and Solicitation Procedures Order, on the public access website at www.kccllc.net/Stanadyne.

8. In accordance with the Solicitation Procedures Order, KCC received, reviewed, determined the validity of, and tabulated the Ballots submitted to vote on the Plan. Each Ballot submitted to KCC was date-stamped, scanned, assigned a Ballot number, entered into KCC’s voting database, and processed. To be included in the tabulation results as valid, a Ballot must have been (a) properly completed pursuant to the Solicitation Procedures Order, (b) executed by the relevant holder entitled to vote on the Plan (or such holder’s representative), (c) returned to KCC via an

approved method of delivery set forth in the Solicitation Procedures Order, and (d) received by KCC on or before October 26, 2023 at 4:00 p.m. (Eastern Time) (the “Voting Deadline”).

9. The final tabulation of votes cast by timely and properly completed Ballots received by KCC is attached hereto as **Exhibit A**. The detailed Ballot reports for the Voting Classes 3, 4, and 5 are attached to this Declaration as **Exhibit A-1** through **Exhibit A-3**, respectively.

10. A report of any parties in the Voting Classes excluded from the final tabulation, and the reasons for exclusion of such Ballots, is attached hereto as **Exhibit B**. All such Ballots were not counted for one of the following reasons: Ballot did not indicate an acceptance or rejection (i.e. an “abstained” vote), or the Ballot was returned late.

Conclusion

To the best of my knowledge, information and belief, the foregoing information concerning the distribution, submission, and tabulation of Ballots in connection with the Plan is true.

Dated: November 1, 2023

/s/ Andres A. Estrada
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